

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  AKORN HOLDING COMPANY LLC,  Debtor.	Chapter 7  Case No. 23-10253 (KBO) (Jointly Administered)
In re:  AKORN INTERMEDIATE COMPANY LLC  Debtor.	Case No. 23-10254 (KBO)
In re:  AKORN OPERATING COMPANY LLC  Debtor.	Case No. 23-10255 (KBO)

**CERTIFICATION OF COUNSEL REGARDING  
STIPULATION AND AGREED PROTECTIVE ORDER**

I, John T. Carroll, III, counsel to George L. Miller, chapter 7 trustee (the “Chapter 7 Trustee”) of the estates (the “Estates”) of the above-captioned debtors (the “Debtors”) hereby certify as follows:

1. On June 21, 2024 the *Debtors’ Motion for Entry of an Order Authorizing and Approving the Conversion of these Chapter 7 Cases to Cases under Chapter 11* [D.I. 832] (the “Contested Matter”) was filed by Akorn Holding Company LLC, Akorn Intermediate Company LLC and Akorn Operating Company LLC (collectively, the “Movants”).

2. On July 9, 2024 the Chapter 7 Trustee filed the *Chapter 7 Trustee’s Objection to the Debtors’ Motion for Entry of an Order Authorizing and Approving the Conversion of These Chapter 7 Cases to Cases Under Chapter 11* [D.I. 858].

3. On July 31, 2024 the Movants filed the *Debtors' Reply in Further Support of Motion for Entry of an Order Authorizing and Approving the Conversion of These Chapter 7 Cases to Cases under Chapter 11* [D.I. 909].

4. On September 5, 2024 the Trustee filed the *Sur-Reply in Support of Chapter 7 Trustee's Objection to Debtors' Motion for Entry of an Order Authorizing and Approving the Conversion of These Chapter 7 Cases to Cases under Chapter 11* [D.I. 955].

5. The Movants and the Chapter 7 Trustee (the Chapter 7 Trustee and, collectively with the Movants, the "Parties," and each, a "Party"), through their counsel have conferred and reached an agreement in the form of a Stipulation and Agreed Protective Order regarding the production of certain confidential information documents or things in connection with the Contested Matter.

6. A copy of the Order Regarding Stipulation and Agreed Protective Order (the "Protective Order") is attached hereto as Exhibit "A". A copy of the Stipulation and Agreed Protective Order is attached to the Protective Order as Exhibit "1" (the "Stipulation").

7. The Parties request entry of the Protective Order attached hereto as Exhibit "A" at the earliest convenience of the Court.

Dated: September 6, 2024

COZEN O'CONNOR

By: /s/ John T. Carroll, III  
John T. Carroll, III (DE No. 4060)  
1201 North Market Street  
Suite 1001  
Wilmington, DE 19801  
(302) 295-2000 Telephone  
[jcarroll@cozen.com](mailto:jcarroll@cozen.com)

***Counsel to George L. Miller, Chapter  
7 Trustee***